

HOLLSTEIN KEATING CATTELL JOHNSON & GOLDSTEIN P.C.

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

HSH NORDBANK, AG, as successor to	:	
Hamburgische Landesbank Girozentrale,	:	
Plaintiffs	:	
v.	:	CIVIL ACTION: 03-3520
	:	
M/V AHMETBEY, <i>In Rem</i> ,	:	
	:	
and	:	
	:	
ODIN DENIZCILIK, A.S., <i>In personam</i> ,	:	
Defendants	:	

**MOTION FOR SATISFACTION OF JUDGMENT AND REIMBURSEMENT OF
CUSTODIA LEGIS EXPENSES, COSTS, AND ATTORNEYS' FEES**

Plaintiff, HSH Nordbank, A.G., by and through their attorneys, Hollstein, Keating, Cattell, Johnson & Goldstein, P.C., hereby move for the Satisfaction of the Judgment and Reimbursement of *custodia legis* expenses, costs and attorneys' fees from the proceeds of the sale of the M/V AHMETBEY in the registry of the court. Plaintiff also moves for payment to the Republic of Turkey, Ministry of Labor and Social Security taxes owed by Odin Denizcilik, and payment to the United States Marshal of his commission for the sale of the M/V AHMETBEY. In support, Plaintiff submits a Memorandum of Law and an Affidavit, detailing the bases for Plaintiff's Motion, which are being filed contemporaneously with this Motion.

Respectfully submitted,

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Patrick J. McStravick, Esquire
Attorneys for Plaintiff, HSH Nordbank, AG

Date: _____